

**Appendix A**

<b><i>Para.</i></b>	<b><i>Statement</i></b>	<b><i>Not a Statement of Fact</i></b>	<b><i>Not Material</i></b>	<b><i>Non- Actionable Statement to Congress</i></b>	<b><i>Fails To Plead “Mismatch”</i></b>
Multistate ¶ 85	But externally, Meta has denied that it places a monetary value on young users. On September 30, 2021, at a Senate subcommittee hearing, Senator Amy Klobuchar asked Meta executive Antigone Davis what Meta believed the lifetime monetary value of young users was; Davis responded, “[t]hat’s just not the way we think about [it].” Davis also denied that Meta “considered the profit value of developing products when [Meta] make[s] their decisions of how those products look,” testifying that this would be a “terrible business model.”		X	X	
Multistate ¶ 122	Meta represents to the public, including investors and analysts, that it prioritizes safety. For example, during a public earnings call on January 29, 2020, Sandberg stated, “[we] have to keep people safe and give them control over their experience on our apps. And we are.”	X			
Multistate ¶ 123	Later that year, on October 29, 2020, Sandberg explained during a different public earnings call that “[w]hile we continue to invest in helping businesses, we are equally focused on keeping our platform safe.”	X			
Multistate ¶ 125	As reported by Quartz, at a technology event in the spring of 2018, Instagram Director of Fashion Partnerships Eva Chen publicly stated that Meta’s “entire focus is focusing on the wellbeing of the community” and that “[m]aking the community a safer place, a place where people feel good, is a huge priority for Instagram.”	X			

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Multistate ¶ 126; Fla. ¶ 40	In June 2019, Mosseri (Head of Instagram) told CBS in an interview that teen well-being is a top priority. And two years later, in May 2021, Mosseri minimized Instagram’s negative impact on teens, characterizing it to reporters as “quite small,” as reported by the Wall Street Journal that September	X			
Multistate ¶ 128; Fla. ¶ 41	Meta has also sought to persuade lawmakers that its Platforms are safe for youth. On September 30, 2021, Meta executive Antigone Davis testified to Congress, “[w]e have put in place multiple protections to create safe and age-appropriate experiences for people between the ages of 13 and 17.”	X		X	
Multistate ¶ 129	Meta has also sought to reassure the public that it prioritizes youth safety on its own blogs and Platform websites. On December 7, 2021, Mosseri wrote in a blog post entitled “Raising the Standard for Protecting Teens and Supporting Parents Online” that “[a]t Instagram, we’ve been working for a long time to keep young people safe on the app.”	X			
Multistate ¶ 130	Similarly, Instagram’s website characterized the Instagram app as a “safe and supportive community” for its users.	X			
Multistate ¶ 131	Likewise, a blog post from December 15, 2022 on about.instagram.com bears the title “Continuing to Keep Instagram Safe and Secure.”	X			

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Multistate ¶ 137	Zuckerberg stated to Congress on March 25, 2021, that “it is a common misconception that our teams—our goals, or even have goals, of trying to increase the amount of time that people spend” and “I don’t give our News Feed team or our Instagram team goals around increasing the amount of time that people spend.”		X	X	
Multistate ¶ 138	Meta has also claimed, in a statement published by Gizmodo on October 3, 2021, to “do internal research to ask hard questions and find out how we can best improve the experience for teens.”	X			X
Multistate ¶ 167	In a June 8, 2021 public blog post on Instagram’s website, Mosseri stated that Meta collects and supplies its Recommendation Algorithms with thousands of “signals” across Instagram’s Feed and Stories, including “[y]our activity” and “[y]our history of interacting with someone.” Mosseri’s post explained that the collection of “[y]our activity . . . helps us understand what you might be interested in . . .” and the collection of “[y]our history of interacting with someone . . . gives us a sense of how interested you are generally in seeing posts from a particular person.”	X			X
Multistate ¶ 168	Similarly, Facebook’s Vice President of Global Affairs wrote in Medium on March 31, 2021, about Facebook’s Recommendation Algorithms: “The goal is to make sure you see what you find most meaningful—not to keep you glued to your smartphone for hours on end. You can think about this sort of like a spam filter in your inbox: it helps	X	X		X

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	filter out content you won’t find meaningful or relevant, and prioritizes content you will.”				
Multistate ¶ 169	Likewise, Meta’s terms of service on data collection state that Meta uses user data to “[p]rovide, personalize and improve our Products,” “[p]rovide measurement, analytics, and other business services,” “[p]romote safety, integrity and security,” “[c]ommunicate with you,” and “[r]esearch and innovate for social good.”	X			
Multistate ¶ 173	Meta admits in its Privacy Policy that it uses data provided by its young users for purposes other than facilitating meaningful social experiences, such as “improv[ing] our Products . . . includ[ing] personalizing features, content and recommendations, such as your Facebook Feed, Instagram feed, Stories, and ads.”	X			X
Multistate ¶ 174	This includes using young users’ data to “[t]est out new products and features to see if they work” and to “[g]et feedback on our ideas for products or features.”				X

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Multistate ¶ 185	For example, on September 30, 2021, Davis denied that Meta promotes harmful content, such as content promoting eating disorders to youth, when she testified before Congress, stating, “we do not direct people towards content that promotes eating disorders. That actually violates our policies, and we remove that content when we become aware of it. We actually use AI to find content like that and remove it.		X	X	
Multistate ¶ 187	Likewise, in a June 8, 2021 post on the Instagram website, titled “Shedding More Light on How Instagram Works,” Mosseri describes Meta’s Recommendation Algorithms by providing examples of benign content recommendations (e.g., “if you’re interested in dumplings you might see posts about related topics, like gyoza and dim sum . . .”). The post provides no accompanying examples or warnings disclosing that the Recommendation Algorithms also tend to suggest content that is dangerous or harmful for young users.				X
Multistate ¶ 188	The Instagram website also boasts that “[a]t Instagram, we have guidelines that govern what content we recommend to people” and specifies that Instagram “avoid[s] making recommendations that may be inappropriate for younger viewers . . . . We use technology to detect both content and accounts that don’t meet these Recommendations Guidelines and to help us avoid recommending them. As always, content that goes against our Community Guidelines will be removed from Instagram.”	X			X

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Multistate ¶ 191	Meta falsely represents that its Recommendation Algorithms are benign and designed for young users’ well-being. For example, during a congressional hearing on March 25, 2021, Zuckerberg denied that Meta “make[s] money off creating an addiction to [its] platforms.” At the same hearing, Zuckerberg stated that “the way we design our algorithms is to encourage meaningful social interactions” and denied that Meta’s teams “have goals[] of trying to increase the amount of time that people spend [using Meta’s Platforms].”		X	X	
Multistate ¶ 192; Fla. ¶ 43	Elsewhere, Meta has reiterated that its Recommendation Algorithms are optimized to yield “positive experience[s]” or “meaningful interactions” as opposed to maximizing “time spent” by users on the Platforms. For example, on September 30, 2021, Davis testified before Congress that Meta “made changes to our News Feed to allow for more meaningful interactions, knowing it would impact time spent” and that Meta did this “because we were trying to build a positive, more positive experience.”	X			X
Multistate ¶ 222	At the same time Meta was prioritizing engagement over safety (and in turn, increasing its profits), Meta continued to insist that user well-being (especially teen well-being) was its top priority, including through a January 2018 statement by Zuckerberg that the company was “focused on making sure Facebook isn’t just fun to use, but also good for people’s wellbeing,” as reported by the Guardian.	X			

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Multistate ¶ 223	For example, on October 5, 2021, Zuckerberg reacted to former Facebook product manager Frances Haugen’s whistleblower revelations and testimony to Congress—which sent Meta’s stock price down over 10% in the six weeks following the initial revelations—by publicly stating in a post on his Facebook profile: “At the heart of these accusations is this idea that we prioritize profit over safety and well-being. That’s just not true.”	X			
Multistate ¶ 265	Indeed, in the context of discussing whether Like counts should remain visible at WIRED’s annual conference on November 8, 2019, Mosseri publicly stated that “[w]e will make decisions that hurt the business if they’re good for people’s well-being and health . . . .”	X			X
Multistate ¶ 284	A May 26, 2021 Meta blog post, titled “Giving People More Control on Instagram and Facebook,” claimed that although the company tested Daisy “to see if it might depressurize people’s experience on Instagram,” Meta had decided not to implement it as a default because “not seeing like counts was beneficial for some, and annoying to others.”				X

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Multistate ¶ 287	Additionally, in an interview with press in May 2021 about why Meta did not implement Daisy as a default setting, Mosseri stated “there was very little impact and the result was neutral,” and, therefore, Meta made Daisy an opt-in feature.	X			X
Multistate ¶¶ 330 – 31	Publicly, Meta touts its Social Media Platforms’ time management “tools,” creating the misleading impression that Meta’s Social Media Platforms are designed to empower users’ efforts to self-limit the duration and frequency of their social media use.  For example, on August 1, 2018, Meta published a post online titled “New Time Management Tools on Instagram and Facebook” that described “new tools to help people manage their time on Instagram and Facebook” because Meta purportedly “want[s] the time people spend on Instagram and Facebook to be intentional, positive and inspiring.”	X			X
Multistate ¶ 334	For example, on September 30, 2021, Meta executive Davis denied that Meta promotes harmful information, such as information that promotes eating disorders, when testifying before Congress, stating: “[w]e do not direct people towards content that promotes eating disorders. That actually violates our policies, and we remove that content when we become aware of it. We actually use AI to find content like that and remove it.”			X	X



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Multistate ¶ 335	Davis also testified that for teen girls struggling with “loneliness, anxiety, sadness, and eating disorders,” they “were more likely to say that Instagram was affirmatively helping them, not making it worse.”			X	X
Multistate ¶ 336	Davis also testified that Instagram “work[s] with experts to help inform our product and policies” around eating disorders. Meta publishes this same statement in a section devoted to “[e]ating disorders” and “negative body image” in its “parent and guardian’s guide to Instagram,” which it makes available on its website.			X	X
Multistate ¶ 368	Davis falsely denied to the public and lawmakers that Meta promotes and makes available content associated with eating disorders, when in fact, Meta’s own Platform features are associated with body image issues related to eating disorders.			X	X
Multistate ¶ 374; Fla. ¶ 45	Meta has long denied that its Social Media Platforms are designed to be addictive. In July 2018, Meta told the BBC that “at no stage does wanting something to be addictive factor into” the design process for its Platforms.				X

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Multistate ¶ 375; Fla. ¶ 46	On September 30, 2021, Davis testified before Congress that Meta does not build its Platforms to be addictive and disputed the addictive nature of Meta’s Platforms.			X	X
Multistate ¶ 415; Fla. ¶ 47	During a congressional hearing on March 25, 2021, Zuckerberg stated he did not believe Meta’s Platforms harm children. Instead, Zuckerberg suggested that Meta’s Platforms are good for teens and adults alike because they “help people stay connected to people they care about, which I think is one of the most fundamental and important human things that we do.”	X			
Multistate ¶ 419; Fla. ¶ 48	At the March 25, 2021 congressional hearing, Zuckerberg was asked whether passive consumption of social media content, like that promoted by Instagram’s infinite scroll, harmed children’s mental health. Zuckerberg refused to give a yes or no answer, even though many Meta researchers had established that passive consumption of social media content harms mental health. Zuckerberg again played up the benefits of Meta’s Platforms to the committee, stating that “[o]verall, the research that we have seen is that using social apps to connect with other people can have positive mental health benefits and well-being benefits by helping people feel more connected and less lonely.” Zuckerberg made this statement despite being given talking points on the negative effects of passive consumption on mental health to prepare for the congressional hearing.	X		X	

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Multistate ¶ 425	In May 2021, Mosseri told reporters that the research he had seen suggested Instagram’s effects on teen well-being are likely “quite small,” as reported by the Wall Street Journal that September. Yet by that time, Mosseri had been apprised of many of the significant harms teens experienced from using Instagram.	X			
Multistate ¶ 427	Externally, Meta’s leadership continued to be evasive about the company’s research. On December 8, 2021, Mosseri told Congress, “I don’t believe that research suggests that our products are addictive.”	X		X	
Multistate ¶ 438	Meta deceives the public regarding its policies when underage accounts are reported. If someone reports that an account belongs to an individual under the age of 13, Instagram’s Help Center claims that “[w]e will delete the account if we can’t verify the account is managed by someone over 13 years old.”				X
Multistate ¶ 438; Fla. ¶ 69	Zuckerberg told Congress on March 25, 2021, “if we detect that someone might be under the age of 13, even if they lied, we kick them off.”			X	X
Multistate ¶ 448	Meta’s external narrative around its proposed Platforms for users under age 13 was misleading because Meta claimed it would prioritize “safety and privacy” of kids under age 13 in versions of Instagram, including in a statement issued to the press and reported by CNBC on May 10, 2021, when internal documents reveal that Meta was focused on driving engagement of this age group and how to ensure these children would “age up” to Instagram and Facebook.	X	X		

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Multistate ¶ 460	To that end, Meta regularly publishes Community Standard Enforcement Reports (CSER or Reports) that boast very low rates of its community standards being violated—while omitting from those reports Meta’s internal user experience survey data showing high rates of users’ actual encounters with harmful content on Meta’s Platforms.				X
Multistate ¶ 464; Fla. ¶¶ 60–61	<p>Meta has publicly represented that the “prevalence” statistics in the Reports are a reliable measure of the safety of its Social Media Platforms—even going so far as to assert that the CSER “prevalence” numbers were “the internet’s equivalent” of scientific measurements utilized by environmental regulators to assess the levels of harmful pollutants in the air. For example, in a May 23, 2019 post on its website entitled “Measuring Prevalence of Violating Content on Facebook,” Meta stated the following:</p> <p>One of the most significant metrics we provide in the Community Standards Enforcement Report is prevalence. . . . We care most about how often content that violates our standards is actually seen relative to the total amount of times <i>any</i> content is seen on Facebook. This is similar to measuring concentration of pollutants in the air we breathe. <i>When measuring air quality, environmental regulators look to see what percent of air is Nitrogen Dioxide to determine how much is harmful to people. Prevalence is the internet’s equivalent</i> — a measurement of what percent of times someone sees something that is harmful.</p>				X

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Multistate ¶ 465; Fla. ¶ 62	Zuckerberg told Congress on March 25, 2021 that Meta’s “prevalence” numbers serve as a “model” for companies’ transparency efforts.	X			X
Multistate ¶ 473	For example, the third quarter 2019 Report touts Meta’s “Progress to Help Keep People Safe.” Likewise, the second quarter 2023 Report states that “[w]e publish the Community Standards Enforcement Report . . . to more effectively track our progress and demonstrate our continued commitment to making Facebook and Instagram safe.”	X			X
Multistate ¶ 474	Each of the Reports—whether they contain an express representation about safety—create the net impression that harmful content is not “prevalent” on Meta’s Platforms and that the Platforms are therefore safe for users, including young users.	X			X
Multistate ¶ 480	The impression that the Reports create—that Meta’s Platforms are safe and users only rarely encounter harmful content—is false and misleading.	X			X
Multistate ¶ 481	Meta’s third quarter 2021 Report estimated that on Instagram, “less than 0.05% of views were of content that violated our standards against Suicide & Self-Injury.” That representation created the impression that it was very rare for users to experience content relating to suicide and self-injury on Instagram.				X

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Multistate ¶ 490	The third quarter 2021 Report concluded that only “0.05-0.06%” of views on Instagram were of content that violated Meta’s standards on bullying and harassment. This representation created the impression that it was very rare for users to experience bullying or harassment on Instagram.				X
Multistate ¶ 499	Meta’s Reports similarly misrepresented the frequency that its users experienced harmful content on Facebook. For example, in its Report for the fourth quarter of 2020, Meta represented that only about 0.05% of views of content on Facebook were of violent and graphic content. However, Meta’s internal survey data of Facebook users during that period showed approximately 10 to 13% of surveyed users reported seeing graphic violence content on the Platform. In contrast to the misleading image that Meta created of graphic violence being exceedingly rare on Facebook, Meta knew that a substantial portion of Facebook users reported encountering graphic violence on the Platform.				X

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Multistate ¶ 501	Relatedly, Zuckerberg’s public statements about “prevalence” of harmful content creates a misleading picture regarding the harmfulness of Meta’s Social Media Platforms.				X
Multistate ¶ 562	Similarly, even though Meta knows that its Platforms are harmful to teenagers’ mental health, Meta externally characterizes Instagram as a source of support for teens struggling with thoughts of suicide and self-injury and mental health issues generally, including in Mosseri’s December 8, 2021 congressional testimony.			X	

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Multistate ¶ 564	Meta takes great effort to distance itself from the reality that Meta’s Platforms are harmful for teen mental health. For example, when M.R., a 14-year-old, committed suicide after being exposed to suicide and self-injury content on Instagram, Meta sent an executive to a U.K. coroner’s court to deny that its Platform played any role in M.R.’s suicide—even though an internal document had found a palpable risk of “similar incidents” because its algorithmic Platform features were “[l]eading users to distressing content.”				
Multistate ¶ 565	During an official inquest investigating the role that social media platform content played in M.R.’s death, and as reported by the Guardian on September 30, 2022, a Meta executive said that such content was “safe” for children to see. The coroner rejected this claim, finding instead in his October 13, 2022 report that M.R. “died from an act of self-harm whilst suffering from depression and the negative effects of on-line content” that she had not sought out, but that the Platforms’ algorithms had pushed on her.				



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Multistate ¶ 571	Additionally, following BBC articles regarding M.R., Instagram, and eating disorder and suicide content impact on teens, in January 2019, Meta crafted a press statement which said: “Because self-harm is a complicated and nuanced issue, especially for those that are suffering, we have worked with experts to ensure that our approach reflects that complexity and nuance. This is why we allow content that consists of self-harm or eating disorder admission . . . [and] we send support resources to the account holder.”				X
Multistate ¶ 574	Meta similarly downplayed the issue of compulsive use on its Platform. It attempted to frame “the public narrative” on such use by promoting the concepts of “intentional” or “meaningful” time spent on its platforms. However, Meta acknowledged internally that it does not “have in-app educational and control upselling tools supporting meaningful and intentional use of [Instagram].”	X			X
Multistate ¶ 592	For example, Meta claims that it conducts research to make its Platforms safer for teens. During congressional testimony on September 30, 2021, Davis stated that “we conduct this research [about young people’s experiences on Instagram] . . . to minimize the bad and maximize the good.” But, as Meta employees internally noted, and as discussed further below, Meta’s well-being research is often not actually implemented into its Platforms, and Meta	X			X

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	executives have ignored or refused to fund requests to do so.				
Multistate ¶ 593	As another example, in August 2021, Senators Richard Blumenthal and Marsha Blackburn wrote to Zuckerberg with detailed questions concerning the nature and findings of Meta’s research on “the effects of social media platforms on kids’ well-being.” The senators specifically asked whether Meta’s research had “ever found that its platforms and products can have a negative effect on children’s and teens’ mental health or well-being.” Meta’s letter in response failed to disclose its own studies demonstrating that the answer was yes.			X	
Multistate ¶ 596	For instance, in a September 26, 2021, blog post, Meta’s Vice President of Research Pratiti Raychoudhury suggested that some of the presentations relied upon by the Wall Street Journal used “shorthand language . . . and d[id] not explain the caveats on every slide” because they were “created for and used by people who understood the limitations of the research.”	X			X

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Multistate ¶ 598	Meta’s response to the articles also contained misleading statements about the substance of the research. Raychoudhury’s September 26, 2021, post claimed that “research shows that on 11 of 12 well-being issues, teenage girls who said they struggled with those difficult issues also said that Instagram made them better rather than worse.”				X
Multistate ¶ 604	Yet, on September 30, 2021, when Senator Blackburn asked Davis in a congressional hearing how Meta was “restricting access to data internally” and whether Meta’s “policies changed since the Wall Street Journal articles,” Davis responded, “not that I’m aware of certainly.”		X	X	
Multistate ¶ 643	Publicly, for example in congressional testimony provided by Meta executive Antigone Davis on September 30, 2021, Meta has downplayed its actual knowledge of under-13 users on Instagram by pointing out that its terms of service nominally disallow use of Instagram by under-13 users—and that, in recent years, Meta has prompted users to self-report that they are at least 13 years old.			X	X
Multistate ¶ 664; Fla. ¶ 67	Externally, Meta denies that it strives to attract underage users to its Platforms. For example, in September 2021, in response to a Wall Street Journal article regarding underage users on Instagram, Meta provided a written statement claiming that “[l]ike all technology companies, of course we want to appeal to the next generation, but that’s entirely different from the false assertion that we knowingly attempt to recruit people who aren’t old enough to use our apps.”				X

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Multistate ¶ 669	Meta did not meaningfully enforce its nominal age restriction on Instagram, despite its external claims to the contrary, including in Davis’s September 30, 2021 congressional testimony, in which she stated that “we will remove [underage accounts].”			X	X
Multistate ¶ 682	Externally, however, Meta claimed in a July 27, 2021 post, titled “How Do We Know Someone Is Old Enough to Use Our Apps?,” that it used a users’ age stated to either Platform to gate users’ access to both Platforms.				X
Multistate ¶ 685; Fla. ¶ 69	If someone reports that an account belongs to an individual under the age of 13, Meta claims on its Instagram Help Center that “we will delete the account if we can’t verify the account is managed by someone over 13 years old.”				X
Multistate ¶ 685; Fla. ¶ 69	Zuckerberg told Congress on March 25, 2021, “if we detect that someone might be under the age of 13, even if they lied, we kick them off.”			X	X
Multistate ¶ 702	Eventually, in response to pressure from regulators and the public, Meta purported to implement an age gate as part Instagram’s account registration process—but the term “gate” was a misnomer because it did not prevent under-13 users from creating and using Instagram accounts.				X
Multistate ¶ 712; Fla. ¶ 70	While testifying before Congress on September 30, 2021, Meta executive Davis stated: “if we see someone trying to, repeatedly, change the [birth] date to get past that [age screen], we actually will restrict their ability to access the app.”			X	X

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Multistate ¶ 723	Meta externally claimed that it built under-13 products for kids and tweens in a September 27, 2021 post on Instagram’s website entitled “Pausing ‘Instagram Kids’ and Building Parental Supervision Tools,” . . . .				X
Multistate ¶ 729; Fla. ¶ 68	Externally, Meta misleads the public by claiming, in a March 17, 2021 post on Instagram’s website, that “we know that young people can lie about their date of birth. We want to do more to stop this from happening” . . .	X			X
Multistate ¶ 743	Meta externally claimed, through congressional testimony provided by Mosseri on December 8, 2021, that “we train our technology to identify if people are above or below 18 using multiple signals,”—including birthday posts—and that Meta is building new technology to do the same for users under 13.			X	X
Multistate ¶ 792	[F]or example, Davis testified to Congress on September 30, 2021 that Meta’s Platforms are not designed for children 12 and under.			X	X
Multistate ¶ 829	In a recent television ad, Meta claimed that it “build[s] technology that gives you more control and helps keep you safe” including through “tools that can protect—so you can connect.”	X			

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Multistate ¶ 880	For example, as detailed above, Meta made specific representations regarding the safety of its Platforms in its “Community Standards Enforcement Reports,” which described percentage of content posted that Meta removed for violating its Community Standards. In its Reports and accompanying statements made on its website, to reporters, and to Congress, Meta promoted this “prevalence” metric as a reliable measure of the safety of its Social Media Platforms. Meta represented that because it aggressively enforced its Community Standards—thereby reducing the “prevalence” of Community-Standards-violating content—its Social Media Platforms were safe products for young users, and only rarely exposed young users to harmful content and harmful experiences.				X
Fla. ¶ 42	In 2021, Meta’s Global Head of Safety Antigone Davis went as far as to say, “we don’t allow young people to see certain types of content. And we have age gating around certain types of content.” Davis also testified: “When it comes to those between 13 and 17, [w]e consult with experts to ensure that our policies properly account for their presence, for example, by age-gating content.”			X	X